UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

IN THE MATTER OF:)	
Knapheide Manufacturing Co. West Quincy, Missouri;)	Docket Nos. VII-92-H-0008 and VII-93-T-499-E
Respondent.))))	First Modification to Consolidated Consent Agreement and Consent Order
Proceedings under Section 3008	j)	
of the Resource Conservation and Recovery Act of 1976, as amended,)	•
42 U.S.C. §§ 6901 et seq. and)	
Section 325 of the Emergency Planning and Community)	
Right-to-Know Act of 1986, as amended, 42 U.S.C. §§ 11001 et seq.)	
		•

FIRST MODIFICATION

TO CONSOLIDATED CONSENT AGREEMENT AND CONSENT ORDER

This First Modification to Consolidated Consent Agreement and Consent Order ("Modification Agreement") is made to the Consolidated Consent Agreement and Consent Order ("Consent Order") filed in this matter on March 4, 1993.

WHEREAS, the United States Environmental Protection Agency ("EPA"), Region VII, and the Respondent, The Knapheide Mfg. Co. ("Knapheide"), on March 4, 1993 entered into a Consent Order contemplating the performance of certain supplemental environmental projects at the Respondent's facility located at West Quincy, Missouri;



WHEREAS, catastrophic flooding occurring during 1993 resulted in the Respondent ceasing operations at the West Quincy, Missouri facility and moving those operations to Quincy, Illinois at a temporary location, with plans to relocate those operations in Quincy, Illinois at a permanent location;

WHEREAS, in order to allow the Respondent to perform environmentally beneficial supplemental projects under the Consent Order, and in response to the changed circumstances;

NOW, THEREFORE, EPA and the Respondent mutually agree to the following modifications to the Consent Order:

- 1. The Respondent shall not submit an Environmental Audit Plan, conduct an Environmental Audit, or submit an Environmental Audit Report for the West Quincy, Missouri facility as provided in the Consent Order.
- 2. Within 60 calendar days of the effective date of this Modification Agreement, Respondent shall submit to EPA descriptions of the following identified SEPs, which EPA considers are potentially eligible for offset under Section III.E of the Consent Order, either as performed or to be performed in the future. The descriptions shall include a cost estimate/budget, implementation schedule and statement of environmental benefits for such projects:
 - a. A SEP to examine the environmental impact of the flood on the West Quincy, Missouri facility. An initial examination of the facility indicated above-ground fuel and product tanks which were damaged during the flood. The SEP will remove these non-waste containing tanks and remediate environmental damage, if any, which may be discovered during the SEP examination, and which may have been caused by releases from these tanks during the flood. A SEP to address any other environmental impact of

the flood on the West Quincy, Missouri facility identified through this SEP examination shall be included in the SEP Report (hereinafter defined) to be submitted to EPA for consideration under Paragraph 5 of this Modification Agreement.

- b. A SEP identifying the activities performed by the facility prior to the flood, either on or off the facility premises, to prevent or minimize the environmental damage from the flood to the West Quincy, Missouri area, provided that any activities aimed at minimizing such environmental damage are beyond good management practices. These activities shall be documented in a report provided to EPA with appropriate financial documentation of the costs therein.
- c. A SEP to install waste minimization or pollution prevention equipment in the existing temporary facility in Quincy, Illinois that reduces the discharges from the painting process more than required by the appropriate state regulatory agency.
- d. A SEP to examine technologies previously not used by the Respondent for use in the permanent facility to be located in the Quincy, Illinois area. This SEP may include pollution prevention and waste minimization components, provided the goal of the minimization project is to minimize discharges more than required by the appropriate state regulatory agency.
- 3. Within 60 calendar days of the effective date of this Modification Agreement, Respondent shall submit to EPA a Supplemental Environmental Project Investigation Plan ("SEP Plan") for Respondent's facilities located or to be located in the Quincy, Illinois area. The SEP Plan shall be designed to identify environmental improvements that may be made in addition to those that are submitted above. The SEP Plan shall be completed by one or more independent

third parties with no affiliation or financial interest in the Respondent or any parent, subsidiary or affiliate thereof. The SEP Plan shall provide:

- a. a statement of the qualifications of the Respondent's project officer;
- b. a cost estimate/budget for the SEP Plan, SEP investigation and SEP Report;
- c. a schedule for the performance of the SEP investigation; and
- d. the procedures that will be followed during the SEP investigation and developing the SEP Report, described below.
- 4. Upon EPA approval of the SEP Plan, Respondent shall conduct a SEP investigation of the facilities by fully implementing the approved SEP Plan in accordance with the schedule set forth therein. The approved SEP Plan, inclusive of any modifications, shall be incorporated into and become a part of this Order. The SEP Plan, SEP investigation and SEP Report shall have an offset ratio of 60:100; that is, for every dollar spent on the SEP Plan, SEP investigation and SEP Report, sixty cents shall be credited against the outstanding balance of the civil penalty. EPA and Respondent agree that \$37,176.21 in qualifying expense for the Plan has been expended as of the effective date of this Modification Agreement.
- 5. Within 60 calendar days after completion of the activities specified in the SEP Plan, Respondent shall submit to EPA a SEP Report ("SEP Report"), which shall include the following information:
 - a. a description of the facilities and current compliance status of Respondent's operations at the facilities, including identification of waste streams, emissions and current releases to all environmental media at the facilities;
 - b. each Federal, State or local environmental law or regulation identified as being applicable to the facilities;

- c. any other information which, in the judgment of the investigator, merits review or comment, including any recommendation as to suggested improvements and/or modifications which could be made to Respondent's procedures or its facilities to facilitate compliance with environmental laws and regulations or benefit the environment independent of regulatory status, including descriptions of any projects which may constitute SEPs, including a cost estimate/budget and statement of environmental benefits for such SEPs.
- 6. The parties agree that the SEPs identified pursuant to Paragraphs 2 and 5(c) above shall be treated as if submitted to EPA in the Environmental Audit Report described in the Consent Order pursuant to the process described in Paragraphs 14 through 18 of the Consent Order, and shall contain information sufficient to enable the parties to further evaluate, detail, implement and determine the appropriate offset ratio for credit against the civil penalty.
- 7. Respondent shall provide access to EPA to the Quincy, Illinois facility or facilities as provided under Paragraph 36 of the Consent Order.
- 8. Commencing thirty (30) days after the effective date of this Modification agreement, Respondent shall submit to EPA a progress report summarizing Respondent's activities during the thirty (30) day period following the effective date of this Modification Agreement.
- 9. Thereafter, commencing with the first full calendar quarter following the effective date of this Modification Agreement and within 14 days following completion of the preceding quarter, Respondent shall submit to EPA a quarterly progress report summarizing Respondent's activities during said preceding quarter regarding the closure plan, SEP Plan, SEP investigation,

SEP Report, and SEPs, including a statement of qualifying expenses, detailed monthly at Respondent's option, for offset under Section III.E. of the Consent Order.

- 10. Within 30 days of completion of each SEP, including the SEPs submitted pursuant to Paragraph 2 of this Modification Agreement, and including the SEP Plan, SEP investigation and SEP Report taken together as a single SEP, Respondent shall submit to EPA a Completion Report summarizing the activities performed for each SEP and certifying completion of those activities.
- 11. Unless otherwise directed, Respondent shall continue to provide all notices, submittals, coordination and reporting to EPA required under the Consent Order to the Region VII contact identified in the Consent Order and, with respect to the West Quincy, Missouri facility, to the Missouri Department of Natural Resources as identified in the Consent Order. All notices, submittals, coordination and reporting with respect to the Quincy, Illinois facilities, shall be provided to Dan Punzak, Permit Engineer, Division of Air Pollution Control, Illinois Environmental Protection Agency, 2200 Churchill Road, Springfield, Illinois 62794-9276, in addition to the Region VII contact identified in the Consent Order.
- 12. All written documents and notices to be submitted to Respondent pursuant to the Consent Order shall be directed to Gerry Korb, as indicated in the Consent Order, with a copy to Sandra L. Oberkfell, Esq. at an address to be supplied by Ms. Oberkfell for such submittals.

THE PARTIES AGREE that this Modification Agreement is effective when signed and executed by both parties and so ordered by the Regional Judicial Officer below, and shall be incorporated into and become part of the Consent Order.

	For the Respondent:
6/9/94 Date	The Knapheide Mfg. Co.
	For the Complainant:
Date	Michael J. Sanderson, Acting Director Waste Management Division
Date	Robert W. Richards Office of Regional Counsel
Date	Becky Ingrum Dolph Office of Regional Counsel
It is so ordered.	
Robert J. Patrick Regional Judicial Officer	Date

Mr. Gerry Korb Vice President Operations The Knapheide Manufacturing Company P.O. Box C-140 Quincy, Illinois 62306-2140

Dear Mr. Korb:

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I have received and reviewed your letter of December 15, 1993 concerning my facility visit of December 11, 1993. The meeting was very useful to me. I left Quincy with a much better understanding of the flood damage you suffered and the steps you have taken or plan to take to rebuild your company, improve productivity and to minimize the environmental concerns. I thought our discussion of options that the facility could use to comply with the terms of the Consent Agreement relating to Supplemental Environmental Projects (SEP) was very constructive.

After I reviewed your letter, I have some concerns that we did not successfully communicate on all issues during the meeting. I need to correct or clarify some statements you made in the letter. I will comment on each of your lettered paragraphs, but prior to that I want to state clearly that you must comply with the terms of the Consent Agreement and the EPA quidance for SEPs incorporated therein. There are some areas of the Consent Agreement we discussed modifying, but those modification are to help you comply after the flood significantly changed your operations and made the consent agreement as written These changes will require revisions of the not workable. Consent Agreement before they can be implemented. I want to make sure it is clear that failure to comply with the terms of the Consent Agreement will result in EPA collected the penalties stipulated in the Consent Agreement.

The following are my specific responses to your comments.

- A. EPA agrees that you should implement the EPA approved plan for closing this unit. You may need to discuss with the Missouri Department of Natural Resources (MDNR) its approval of the closure plan.
- B. The changes in the audit plan we discussed will require revisions to the Consent Agreement. We have submitted to you a draft of the propose changes and need your response to the changes as soon as possible. I am sure your are aware that the audit plan need to be consistent with the final wording of the amendment. For example the revision will specify when the audit plans will be submitted. The revised audit plan for both facilities will include schedules for completion. As we discussed, parts of the approved plan can be implemented now, i.e., interviews of employees, and need not wait for approval of the revision.
- C. Eligible SEPs. As stated above, to date EPA has not approved

any specific activity, other than the audit. Some of the ideas discussed, if presented as SEPS, would probably qualify as I stated during the visit.

- 1. As I told you at the meeting, fighting the flood seems to falls within the concept of good management practices and therefore would not be acceptable for inclusion as SEPs. As you are aware, if the work is definable as good management practices that you could have done with or without a Consent Order, this would not be acceptable as a SEP under the consent agreement. I think it will be very difficult to show any of the pre-flood work was not good management practices.
- 2. The new paint system may qualify as a SEP if you can demonstrate that the system was not installed as a good management practice or as an effort to comply with Illinois environmental requirements. I will need more information of the function of the system before a definitive decision can be made. I am curious how the Infra Red Technologies processes can convert solvents to CO2 and H2O, especially if the solvents are halogenated.
- 3. Flood clean up cost are only acceptable for consideration if that clean up is not a good management practice. It is possible that some cleanup activities will be acceptable, while others will not. Any claims under this heading must be well documented.
- 4. The removal of the Wood Treatment operation building, including the proper disposal of the building and its contents appears to be acceptable, unless you determine that the material is subject to a Federal, State, or Local regulations that would require the removal of this system. I am concerned that this system cleanup and disposal may be subject to RCRA closure and therefore, may not be considered a SEP.

As I stated during the meeting, I would prefer a removal plan stating how you determined its regulatory status and what the removal procedure will be. This does not have to be detailed. If you determine that the building is such a safety hazard that it would be unsafe to wait for this approval, use you best judgment. EPA does not expect you to not unaddressed imminent hazards while we review the submittals.

- 5. The primary concern for the tanks are the other laws or regulations that may effect these tanks or tank systems. For instance if some of the equipment you are considering removing is a source for the MDNR work at the site, it should not be included as a SEP.
- 6. This removal may be acceptable as a SEP. The concern I

have is to make sure that the tank system being removed is not regulated by UST or other authorities.

- 7. My concern for this activity is that your activities are possibly good management practices. If the removal of these paint booths are a requirement of a rental contract or would expected prior to a rental, it would not be acceptable as SEPs.
- 8. This statement is an error. The cost of the closure of the unit could never be a SEP. My memory of the discussion was that I said the closure would be a very good idea. You stated that you are not using the hazardous waste storage space now and do not intend to use it in the future, therefore per RCRA, you should close the unit. You also stated that this area would be a good area to use for product storage.
- 9. I discussed the fuel and solvent plumes with MDNR after our meeting. I was informed that they intend to require sampling either prior to the written agreement or as a requirement of the agreement. Based on that information, the work you proposed will not be eligible for inclusion.
- 10. Solvent recycling may be acceptable as a SEP. As I stated during the meeting, I am concerned with air discharges during the recycling. I will need to review the entire proposal before I can determine its acceptability.
- 11. Drum Compactors are worthy of consideration as SEP. The proposal for this idea needs to show that this is not identifiable as a good management practice.
- 12. The use of this contractor may be acceptable as a component of the audit. As I said at the meeting, it would only be a SEP when the contractor is going beyond the minimum requirement for releasing volatile organic component (VOC) emissions of the State of Illinois.
- 13. Adoption of the new plant cost as SEP requires a modification of the term of the Consent Agreement which is currently being prepared. One that modification is approved, I will look at any proposed project that complies with the terms of the Consent Agreement.

During the meeting we discuss also the rapid submittal of the financial record supporting the SEP cost to date. Some of these records are past due.

I hope this letter and our telephone conversation of January 18, 1993, clarifies the Agency's concerns and positions. If you have any questions, please call me at (913) 551-7455.

Sincerely,

Ruben B. McCullers Environmental Scientist RCRA Compliance Section

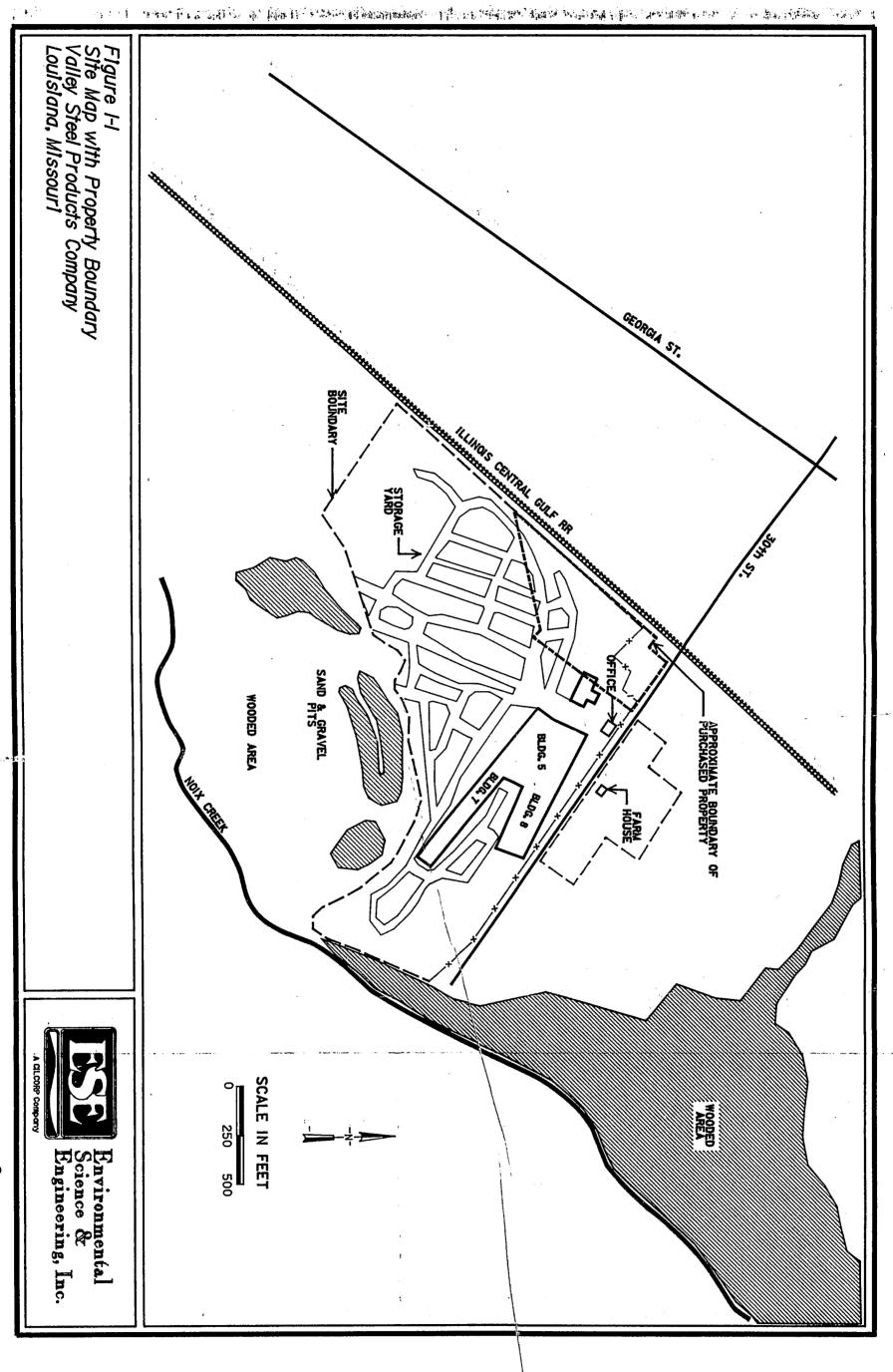
cc. Ed Sadler, MDNR Laurie Bobbitt, MDNR

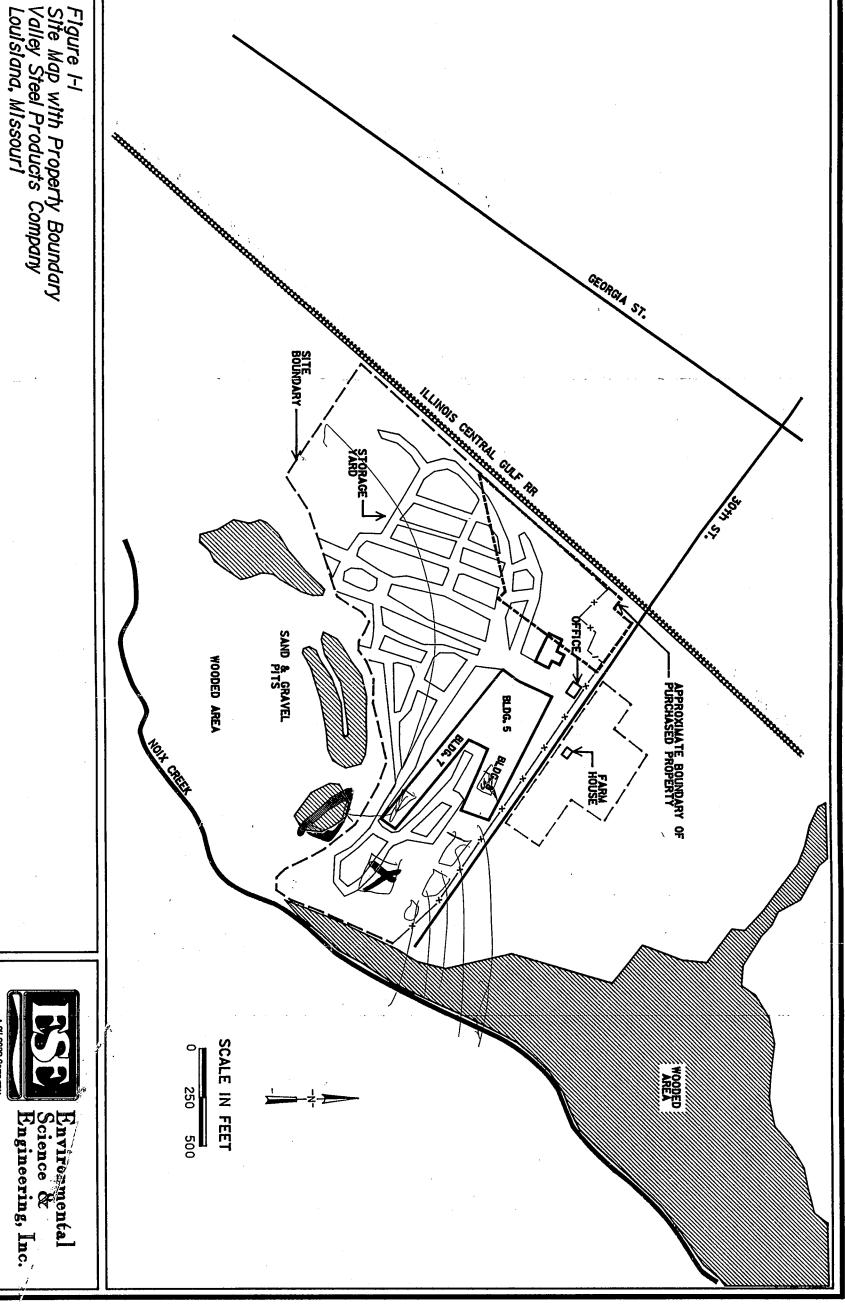
BCC: PRC, Richards, CNSL

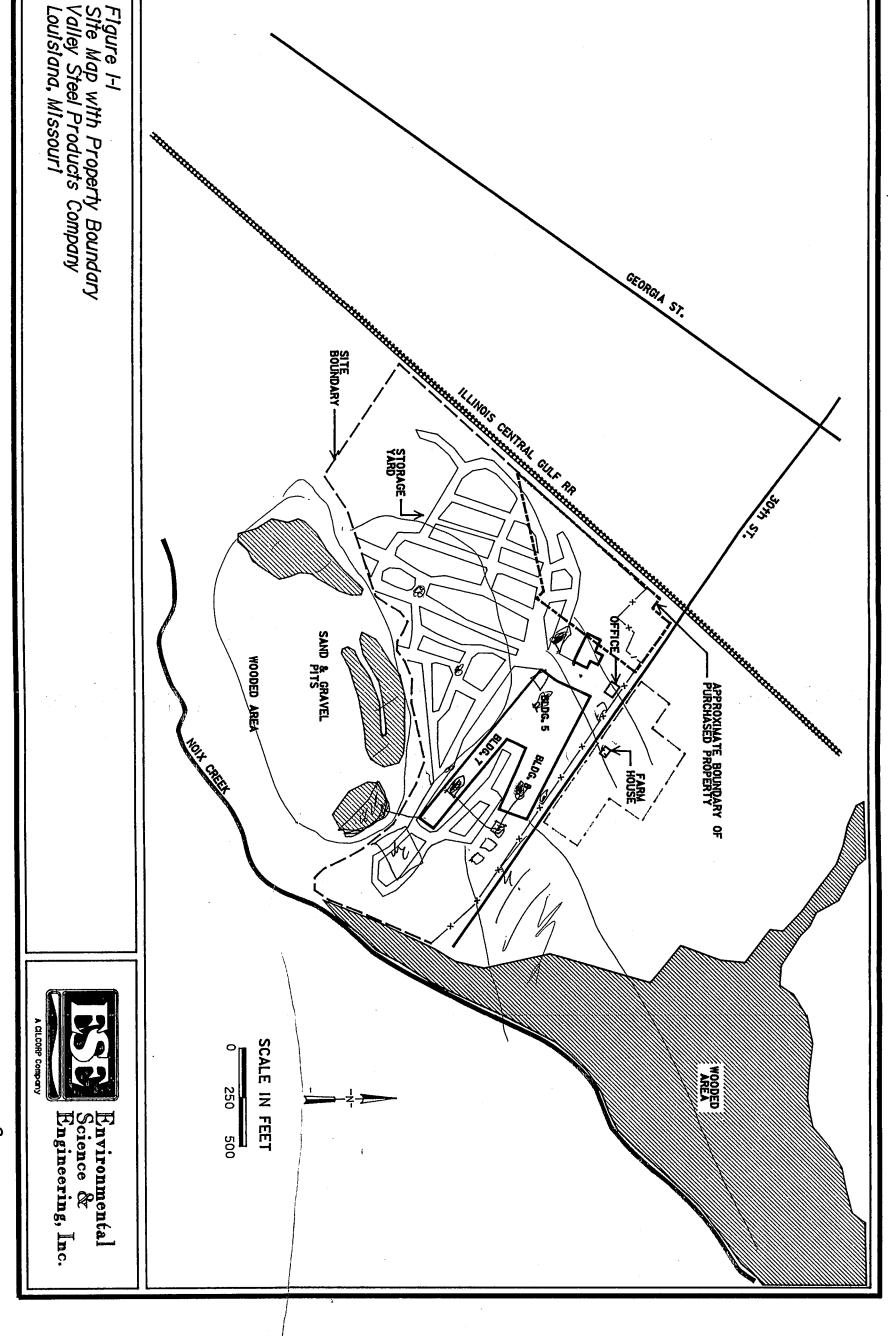
Signoff RBM Richards Doyle

VALLEY STEEL COST ESTIMATE CORRECTIVE MEASURES

COST ELEMENTS		NEW ASSUMPTIONS	OLD ASSUMPTIONS
RFI/CMS	\$300,000		
Ground Water Groundwater Extraction System Groundwater Treatment System Annual Groundwater Treatment @ 10 yrs	\$100,000 \$225,000 \$780,000 \$1,105,000	Pumping rate of 3 gpm per well from ground— water plume of approximately 1.1 million of and 15 ft depth.	Pumping rate of 3 gpm per well from ground— water plume of approximately 1.1 million of and 15 ft depth.
Concrete Retention Tanks Demolition of Concrete Structures Soil Excavation Transportation and Disposal of Soil Transportation and Disposal of Concrete	\$45,000 \$7,700 \$350,000 \$7,000 \$410,000	Approximately 850 cy (1,000 tons) of soil excavated from below each tank to depth of 5 ft.	Approximately 225 cy (275 tons) of soil excavated from below tanks to depth of 2 ft.
Pickle Tank Sludge Piles Soil Excavation Transportation and Disposal of Soil	\$20,000 \$980,000 \$1,000,000	Approximately 2,300 cy (2,800 tons) of soil excavated from area of two piles (61,250 sf) to depth of 2 ft.	Approximately 225 cy (280 tons) of soil excavated from area of two piles (30,000 sf) to depth of 2 ft.
South Sand and Gravel Pit Sediment Dredging Transportation and Disposal of Sediment	\$17,400 \$400,000 \$417,000	Approximately 925 cy (1,160 tons) of sediment dredged from area of one pond (125,000 sf) to a depth of two ft.	Approximately 12,000 cy (15,000 tons) of sediment dredged from area of all ponds to a depth of one ft.
Subtotal	\$3,232,000		
25 Percent Contingency	\$804,000	50 Percent Contingency	\$1,616,000
TOTAL COST	\$4,036,000		\$4,848,000







EPA Green Lights Detailed Regional Snapshot: Region 7

December 31, 1995

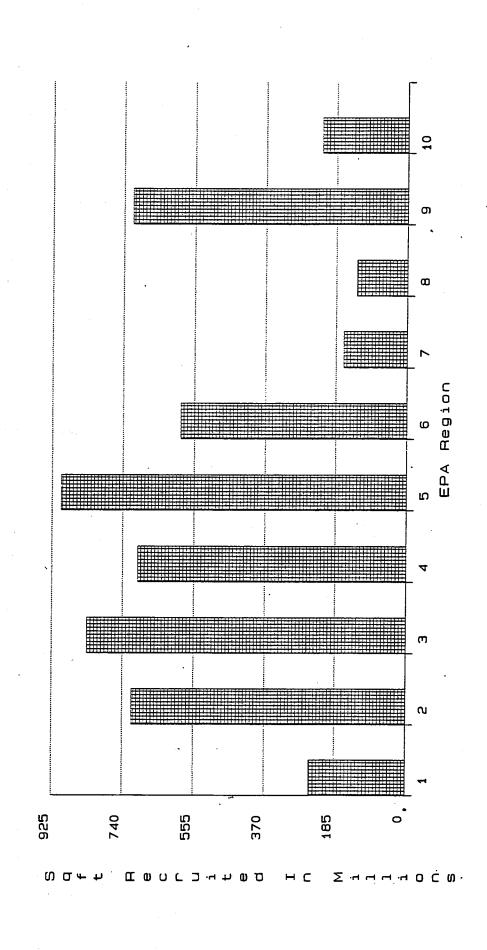
Date Issued: January 24, 1996



	I Snapshot - EPA Regional States 11, 1995	on 7 Page 1
Participation	Number Of Participants	Total Square Footage
Green Lights Partners City/County , Corporate Federal State	0 17 3 2	0 58,710,600 2,650,000 83,630,000
Green Lights Allies Distributor Lighting Management Company Manufacturing Utility Green Lights Endorsers	14 2 8 4 5	7,346,600 12,000 315,200 11,994,200 N/A
Total Change Since Previous Month	55 1	164,658,600 1,400,000
Project Status	Number Of Projects	Project Square Footage
Preliminary Surveys Completed Surveys Partial Upgrades Completed Upgrades	24 633 2 204	1,101,399 39,308,405 152,800 25,139,464
Total In The Upgrade Pipeline	839	64,600,669
Pollution Prevention Per Year	Change This Month	Cumulative
Metric Tons Of CO ₂ Cars Equivalent Trees Equivalent (acres) Metric Tons Of SO ₂ Metric Tons Of NO _X Pounds Of Beryllium Pounds Of Cadmium Pounds Of Chromium Pounds Of Copper Pounds Of Manganese Pounds Of Mercury Pounds Of Nickel Pounds Of Silver	1,386 289 591 13 6 0 4 2 8 0 4	80,601 16,779 34,370 758 347 3 7 185 84 323 6 168
Returns From Completed Upgrades		-
kWh Savings Per Year Lighting Load Reductions (kW) Energy Cost Savings Per Year	64,61 10, \$ 2,52	278.0
Investments in Completed Upgrades		
Total Net Of Rebates	\$ 15,52 \$ 15,37	
Hardware Installed In Completed Upgr	ades	
T8 Lamps Electronic Ballasts Occupancy Sensors Compact Fluorescents Reflectors	20	5,372 0,212 1,712 0,311 8,832

Green Lights Regional ☐ Decemp	Snapshot - EPA Re	gion 7 Page 2
Implementation Indicators		
% of Surveyable SqFt that is Completed Survey % of Upgradeble SqFt that is Completed Upgrad % Late Reporting Average kWh Saved / Square Foot / Year Average % Energy Savings Average IRR		23.9% 17.5% 14.5% 2.57 41.0% 9.0%
Regional Account Schedule	% by Number	% by SqFt
% On/Ahead of Schedule at 1st Anniversary % On/Ahead of Schedule at 2nd Anniversary % On/Ahead of Schedule at 3rd Anniversary % On/Ahead of Schedule at 4th Anniversary % On/Ahead of Schedule at 5th Anniversary	43% 47% 57% 36% 0%	92% 1% 3% 0% 0%

Green Lights Regional Snapshot Graph 1, Total Square Footage Recruited December 31, 1995



nal Snapshot Regional Population 1995 Graph 2, SqFt

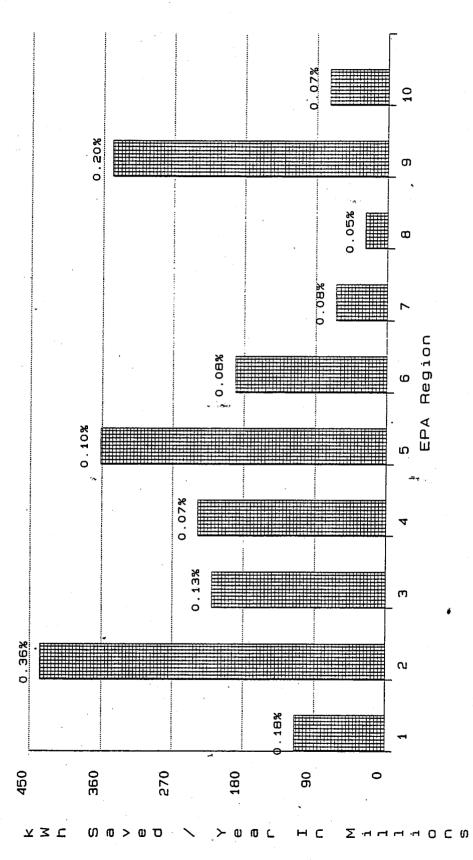
Page 4





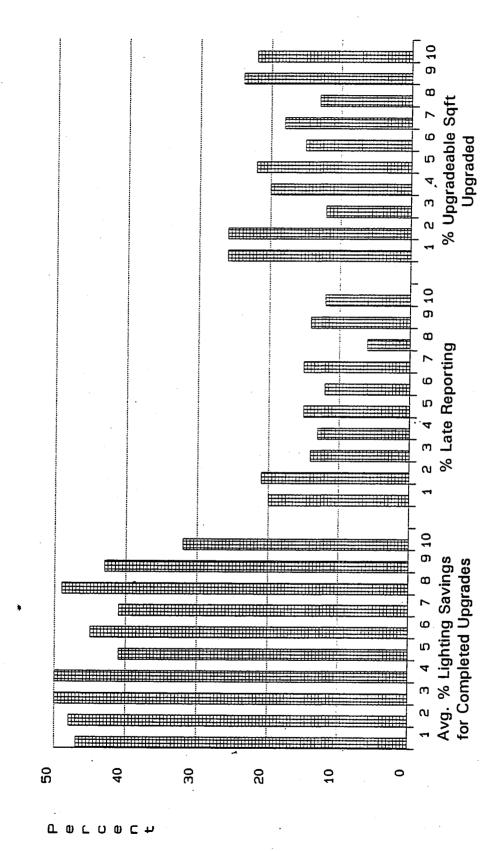
Green Lights Regional Snapshot Graph 4, kWh Saved / Year on Completed Upgrades December 31, 1995

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Numbers on top of bars represent lighting electricity saved per year from completed upgrades / total regional electricity sales per year * 100

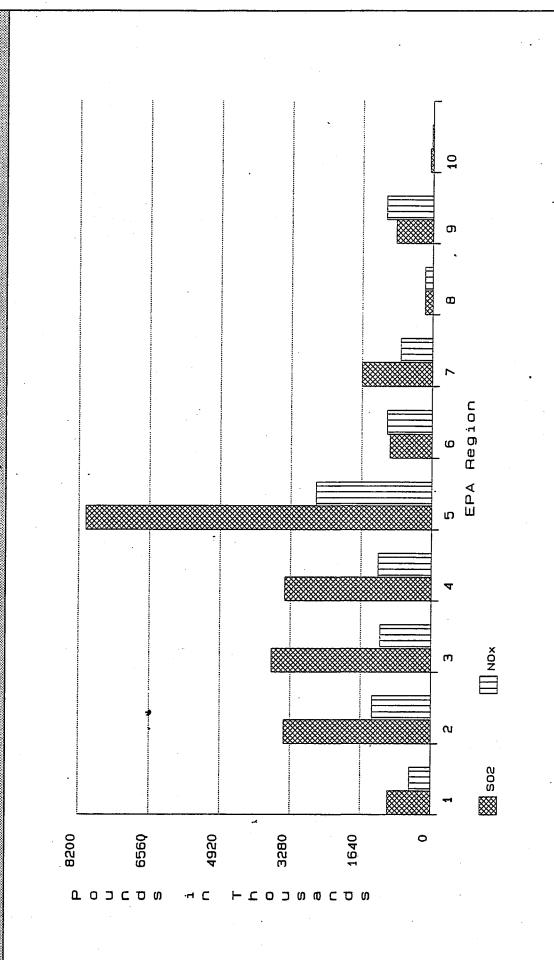
Green Lights Regional Snapshot Graph 5, Lighting Savings, Reporting And Upgrade Analysis December 31, 1995



EPA Region

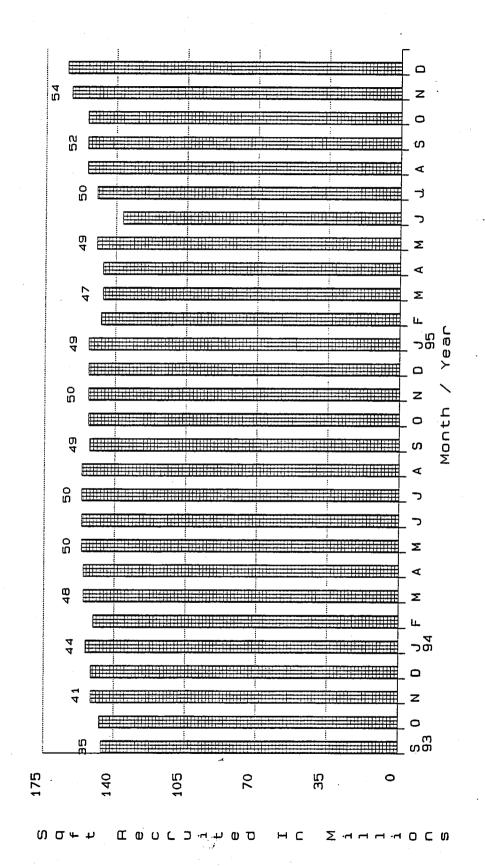
Green Lights Regional Snapshot Graph 7, SO2 And NOx Prevented From Completed Upgrades December 31, 1995





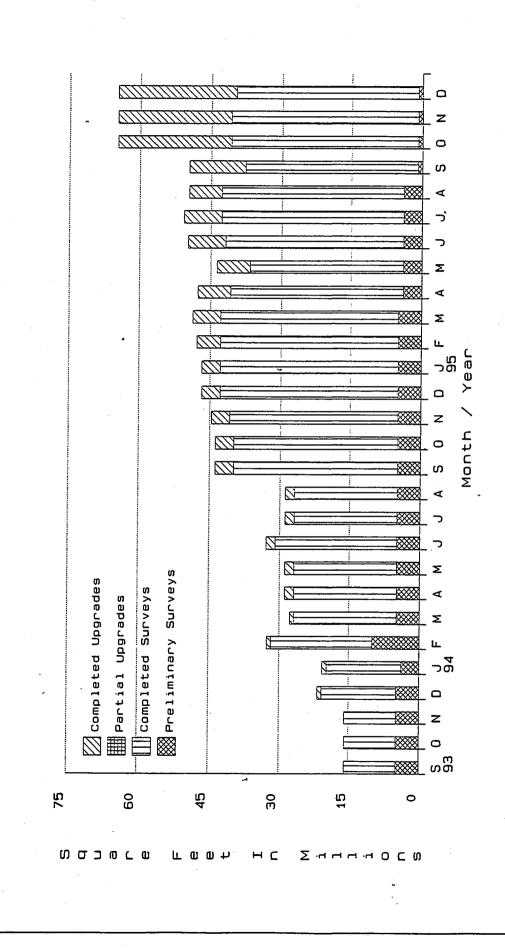
Green Lights Regional Snapshot - EPA Region 7 Graph 8, Total Square Footage



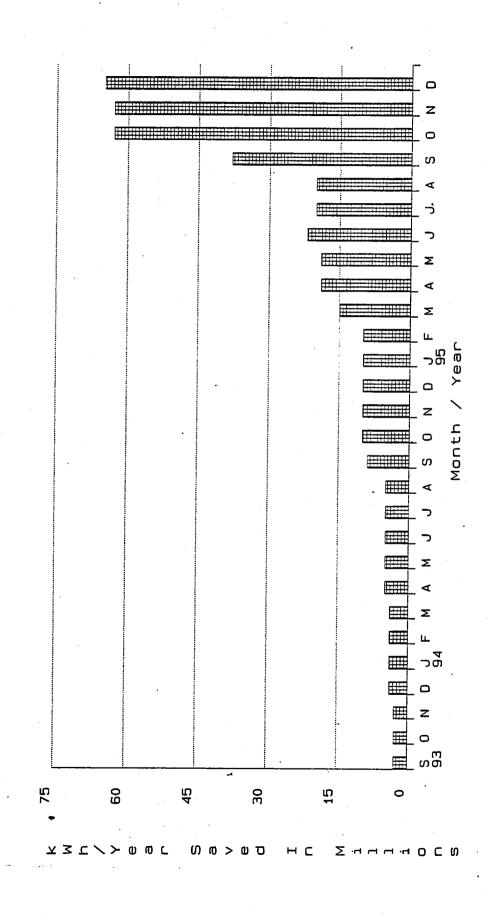


Numbers on top of bars represent total number of participants

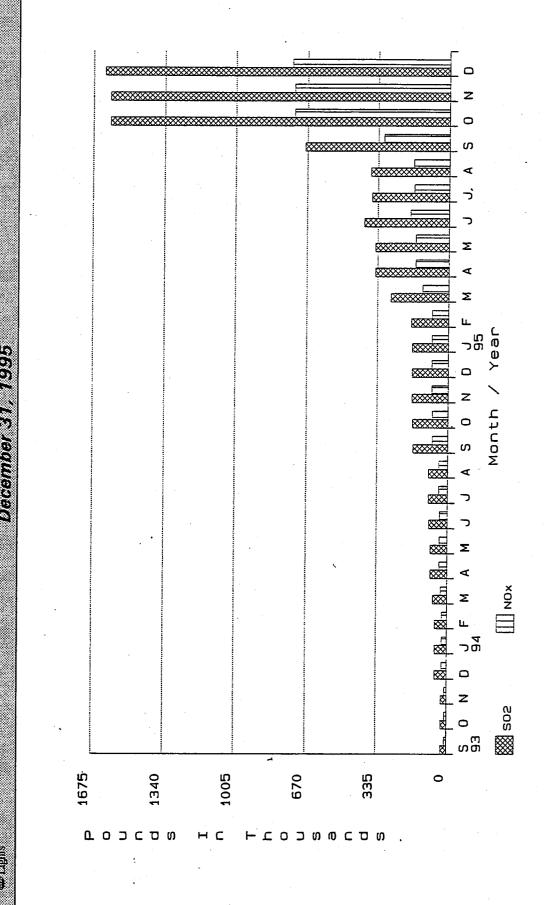
Green Lights Regional Snapshot - EPA Region 7 Graph 9, Square Footage In The Upgrade Pipeline December 31, 1995



Regional Snapshot - EPA Region 7 Year Saved From Completed Upgrades December 31, 1995 Graph 10, k



Green Lights Regional Snapshot - EPA Region 7 Graph 12, SO2 And NOx Prevented From Completed Upgrades December 31, 1995



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, J	Green Lights Regional Snapshot Participants List - EPA Region 7	nal Snapshot PA Region 7	Page 15
State	Participant Name	Implementation Support Specialist	Participant Type
Ā	Adventure Lighting Supply, Ltd.	Andrea Miller	Distributor Ally
Ā	Casey's General Stores, Inc.	Andres Miller	Corporate Partner
⊻	Davenport Community School District	Andrea Miller	Corporate Partner
Ā	HON Industries Inc.	Andrea Millar	Corporate Parther
≰	lowa Association of Business & Industry		Endorser
4	lowa Hospital Association, Inc.		Endorssr
۷.	Mercy Health Center	David Kim	Corporate Partner
₫	Principal Financial Group	Andrea Miller	Corporate Partner
≰	Soil and Water Conservation Society		Endorser
4	Stamats Communications Inc	Andres Miller	Corporate Partner
₹	Stitzell Electric Company	Andrea Miller	Distributor Ally
<u>४</u>	Syneigy Lighting Corporation	Andrea Miller	Lighting Management Company Ally
₹	lowa Army National Guard	Wesley Meyer	Federal Partner
δ	Guardian Lighting Controls, Inc	Andres Miller	Manufacturing Ally
KS	Kansas City Area Hospital Association		Endorser
Ф Ф	Midwest Constitution Systems	Steve Rosenstock	Manufacturing Ally
ĸs	Sharp & Shorten Enterprises	Andrea Miller	Corporate Partner
Š	Stamon Wholssale Electric	Andrea Miller	Distributor Ally
* KS	Wichita Public Schools Unified School District 259	Andrea Miller	Corporate Partner
8	Yallow Freight Systems, Inc.	Andrea Millsr	Corporate Parmsr
ω	A Weatherization Co/Awxco	Andrea Miller	Manufacturing Ally
MO	Archway Lighting Supply Inc.	Andres Miller	Distributor Ally
ω	Butler Supply, Inc.	Andrea Miller	Distributor Ally
OΜ	Olfy Lighting Products Company	Andrea Miller	Distributor Ally
ο Σ	City Utilities of Springfield	Steve Rosenstock	Utility Ally
οW	Claywest House, Inc.	Micki Wileox	Corporate Partner
Ω	Dazor Manufacturing Corporation	Andrea Miller	Manufacturing Ally
οM	Graybar Electric Company	Andrea Miller	Distributor Ally
οW	HE Williams, Inc.	Andrea Miller	Manufacturing Ally
• Mo	Independence School District	Andres Miller	Corporate Partner
o V	International Lighting Manufacturing Company	Andrea Miller	Manufacturing Ally
OMO	Kansas City Fower & Light	Steva Rosanstock	Utility Ally
ω	Metropolitan Energy Center		Endorser
MO	Missouri Vallay, Electrical Company	Steve Rosenstock	Distributor Ally
O W	The State of Missouri	Andrea Miller	State Partner
OW	Mansanta Company	Tad Jackson	Corporate Partner

, J	Green Lights Regional Snapshot Participants List - EPA Region 7	nal Snapshot EPA Region 7	Page 16
State	Participant Name	Implementation Support Specialist	Participant Type
MO	The Original Cast Lighting	Andrea Miller	Manufacturing Ally
MO MO	Starbeam Supply Company	Andras Miller Andrea Miller	Manufecturing Ally Distributor Ally
ON	Missouri Army National Guard	Weslay Meyar	Federal Partner
MO	Union Electric Company	Steve Rosenstock	Utility Ally
OW	United Electric Supply	Andras Millar	Distributor Ally
O OM	United Energy of Missouri, Inc. University of Missouri at Columbia	Andrea Miller Charlotte Weng	Corporate Partner Cotrovate Partner
MO	Venture Stores Inc.	Andrea Miller	Corporate Partner
œΨ	Vills Lightling Supply, Inc.	Andres Miller	Distributor Ally
O Ø	Western EXTRALITE Company of Kanaas City Western EXTRALITE Company of St. Louis	Andrea Miller Andrea Miller	Distributor Ally
ΜO	Westminster College	Andrea Miller	Corporate Partner
NE	Hist Data Robaurces, Inc.	Andres Miller	Corporate Parther
Ä	The State of Nebraska	Andrea Miller	State Partner
NE	Omaha Public Rower Dietrict	Steva Rosanstock	Utility Ally
NE	Superior Light & Sign Maintenance Co.	Andrea Miller	Lighting Management Company Ally
u Z	Nabraaka Army National Guard	Westey Mayer	Federal Partner
빌	Voss Lighting	Andrea Miller	Distributor Ally



Green Lights Program

Introducing... The Green Lights Program



The U.S.

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By encouraging the

widespread use of

energy-efficient &

* lighting, Green

Lights is proving

that profitability and

environmental pro-

tection can go hand

in hand

How is Green Lights Making a Difference?

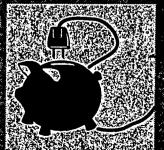
Lighting accounts for 20-25 percent of all electricity sold in the United, States Too often organizations treat lighting as overhead rather than as an opportunity rocurves treat. By changing this mindset and roining Green Lights participants realize average rates of return on their installinvestment of 30 persuasinvestment of 30 persuasinve

cent or more? They reduce their lighting electricity bill by more than half while maintaining—and other improving—lighting quality in lighting diality space mithe United States it would save over 65 million kilowatts or electricity annually reducing the mational electric bill by \$16

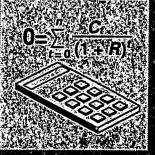
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What's the Bottom Line? !!

Electric Bill Savings: \$16 Billion/Year



Average IRR 30 Percent



Air Pollution Cut. 12 Percent



By signing the Green Lights Memorandum of Understanding (MOU): senior man agement makes it clear that energy. efficient lighting is now one of the organ ization's high priori ties Management is nów able to grant authority, approve budaets, streamline procedures, and assign staff to make the upgrades happen

Who Are Green Lights Participants?

The Green Lights roster includes all kinds of organizations from all over the country in less than 3 years, over 1,150 Partners Allies, and Endorsers have joined the program.

Partners include corpora-; tions of all sizes, nonprofit organizations, and federal, state, and local government agencies. Health care facilities, universities and colleges, and restaurant and hotel chains are just a few examples of the organizations that have teamed up with EPA to upgrade their lighting systems.

What Do Participants Commit To?

Green Lights Isks its members to sign a Memorandum of Understanding (MOU) with EPA In the MOU participants agree to survey 100 percent of their facilities and, within 5

years of signing the MOU.
to upgrade 90 percent of
the square footage that can
be upgraded profitably
without compromising
lighting quality. Participants
also agree to appoint an

implementation manager oversee their progress (no the program and to report at least annually to EPA or their upgrade progress

How Does EPA Support to Participants ?:

EPA provides/a range of support systems to help Green Lights participants obtain information on energy-efficient lighting technology, financing options, and public recognition opportunities.

Lighting Services

Group: provides extensive technical support through a technical information hot-line; a comprehensive Lighting Upgrade Manual, and training workshops:

Decision Support

System: state-or-the-art

computer software that

helps participants survey facilities and select lighting upgrade options that maximize energy savings and meet profitability goals.

Financing Directory
User-friendly computer
data bases of every thirdparty financing program
available

The National
Lighting Product
Information Program:
objective source of curren
performance and price
information on energy-eff
cient lighting products.

Ally Programs: bring

togethermembers of the homing industry and electric infinites to encourage customers to use energy efficient lighting technologies.

Public Recognition:
participants receive public
recognition for their environmental leadership,
through EPA-generated
news articles, media,
events, and public service,
advertisements, EPA
encourages participants to
promote their own Green
Lights activities by distributing ready-to-use promo-



For more information on how to save more) and energy with Green Lights please comacts

Manager Agreen Lights U.S. EPA (620ZJ) ... Washington, DG 20460. fax: 202-775-6680 ...

Ur call 2027/5-6650 For more information by a (available 24 hours a day) call 202233-9659 4

HAZARDOUS WASTE MANIFESTING PROCEDURE

I. Scheduling.

- A. The Quality Control Manager will note when any waste has accumulated for 60 days, so that arrangements are made to transport the waste from our premises for disposal before the 90-day limit.
- B. The Quality Control Manager will provide the Facilities Manager with an inventory of all waste to be transported for disposal.
- C. The Facilities Manager will schedule the shipment date with the disposal company.
- D. When a shipment date has been arranged, the Facilities Manager will notify the Quality Control Manager of the date. Arrangements will be made to load the disposal company truck on the shipment date.

II. Completion of the Manifest.

- The Facilities Manager will fill out a "Hazardous Waste A. Manifest" with respect to all waste to be transported, in accordance with Federal and Missouri regulations. The manifest will be completed per EPA and Missouri DNR instruction sheets (Attachment A) and the attached example (Attachment B). The Missouri instructions contain many requirements in addition requirements. IT IS ESSENTIAL THAT ALL INFORMATION REQUIRED UNDER THE MISSOURI INSTRUCTIONS BE PROVIDED ON THE MANIFEST IN ADDITION TO EPA REQUIREMENTS.
- B. Item 1 of the Manifest: Knapheide's U.S. EPA I.D. No. is M0D000766998. The Manifest Document No. is a five digit number as follows: the first two digits will be the year shipped; the last three digits are the consecutive shipment number. (See the example in III(B) of this Procedure).
- C. Item A of the Manifest: The Missouri Hazardous Waste Manifest Document No. consists of two parts. The first six digits will always be 004809; the last four digits indicate the consecutive shipment number from the site. (See the example in III(B) of this Procedure.)
- D. Item 15 of the Manifest: The following must be included as additional information:

"IF MATERIAL IS NOT DELIVERABLE, RETURN TO GENERATOR."

- E. Use the Missouri form (EPA Form 8700-22/MDNR-HWG10) (as in the example in Attachment B to this Procedure) unless waste is being shipped out of Missouri and the receiving state requires use of the receiving state's form. Although another state's form is used in that situation, all Missouri information required under the Missouri instructions must be provided on that form, regardless whether the receiving state requires such information.
- F. There must be sufficient copies to provide one copy of the manifest to be retained by Knapheide at the time of shipment, one copy for each transporter, one copy for the receiving facility and two copies to be returned to Knapheide. Assuming there is only one transporter, this will mean five copies.
- G. In addition to the manifest, the Facilities Manager will complete a Land Ban Notification Form.

III. Shipment.

- A. When the disposal company truck is loaded, the Facilities Manager, or in his absence, the Quality Control Manager, will verify the accuracy of the "Hazardous Waste Manifest" and sign and date the same. THE FACILITIES MANAGER OR QUALITY CONTROL MANAGER MUST APPROVE THE ACCURACY AND COMPLETENESS OF EACH MANIFEST AND LAND BAN NOTIFICATION PRIOR TO SHIPMENT.
- B. The Facilities Manager will maintain a manifest log in ascending order. The log will include both the EPA manifest document number and the Missouri manifest document number, as described above under II(B) and (C) of this Procedure. For example, for the year 1992, the document numbers would run as follows:

EPA Manifest No.	<u> Missouri Manifest No.</u>
92033	0021
92034	0022
92035	0023

The log will also contain the date of shipment and a brief description of the material shipped.

C. The Facilities Manager will retain one copy of the manifest and one copy of the Land Ban Notification. The original Land Ban Notification and all other copies of the manifest, including the original, will be sent with the transporter. D. The Facilities Manager will maintain all records regarding hazardous waste transportation and disposal. The Facilities Manager will file quarterly manifest summary reports with the Missouri Department of Natural Resources of all hazardous waste shipments according to the following schedule:

Shipment Dates Report Due Dates

January 1 - March 31	May 14
April 1 - June 30	August 14
July 1 - September 30	November 14
October 1 - December 31	February 14

E. When the completed manifest is returned to Knapheide from the receiving facility, it will be attached to Knapheide's copy on file. When the certificate of disposal copy arrives, it will also be attached to the generator copy. If the completed manifest has not been returned within 35 days, the Facilities Manager will contact the transporter and/or the receiving facility to determine the status of the hazardous waste, and will submit a completed exception report to the Missouri Department of Natural Resources within 45 days from the date the waste was accepted by the initial transporter.

Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Sond comments regarding the burden estimate, including suggestions for reducing the burden, to Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W., Washington, D.C. 20469, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

MISSOURI DEPARTMENT OF NATURAL RESOURCES HAZARDOUS WASTE MANIFEST FEDERAL SECTION INSTRUCTIONS

Items 1 through 20

(SEE BACK FOR MISSOURI INSTRUCTIONS)
PLEASE KEEP INSTRUCTIONS ATTACHED UNTIL DELIVERY OF SHIPMENT IS COMPLETE.

GENERATORS

THIS DOCUMENT MUST BE

USEC FOR ALL MISSOURI-

DESTINED SHIPMENTS

Item 1. Generator's U.S. EPA ID Number - Manifest Document number

Enter the generator's U.S. EPA twelve digit identification number and the unique live digit number assigned to this Manifest (E.G., 00001) by the generator.

Hem 2, Page ______ of _____

Enter the 1st page used then the total number of manifests used to document this snipment.

Item 3. Generator's Name and Mailing Address.

Enter the name and mailing address of the generator. The address should be the location that will manage the returned Manifest forms.

Item 4. Generator's Phone Number

Enter a telephone number where an authorized agent of the generator may be reached in the event of an emergency or who can respond to duestions regarding the information on this manifest.

Item 5, Transporter 1 Company Name

Enter the company name of the first transporter who will transport the waste.

Item 6. U.S. EPA ID Number

Enter the U.S. EPA twelve digit Identification number of the first transporter Identified in item S.

Hem 7. Transporter 2 Company Name

If applicable, enter the company name of the second transporter who will transport the waste. If more than two transporters are used to transport the waste, use a 2nd Manifest Sheet and first the transporters in the order they will be transporting the waste. Every transporter used between the generator and the designated facility must be listed.

Item 8. U.S. EPA ID Number

If applicable, enter the U.S. EPA twelve digit identification number of the second transporter identified in Itam 7.

Item 9. Designated Facility Name and Site Address

Enter the company name and site address of the facility designated to receive the waste listed on this Manifest. The address must be the alte address, which may differ from the company mailing address.

Ham 10, U.S. EPA ID Number

Enter the U.S. EPA twelve digit identification number of the designated facility identified in item 9.

Item 11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number (UNINA))

Enter the U.S. DOT Proper Shipping Name, Hazard Class, and 10 Number (UN/NA) for each waste as identified in 49 CFR 171 through 177.

Note — If additional space is needed for waste descriptions, enter these additional descriptions in Item 11 on a second Hazardous Waste Manifest Document.

ttem 12. Container (No. and Type)

Enter the number of containers for each waste and the appropriate abbreviation from Table 1 (below) for the type of container.

Table 1 - Types of Containers

DM - Motal drums, barrels, kegs

DW - Woodan drums, barrols, kegs

DF - Fiberbaard or plastic drums, barrels, kegs

TP - Tanks consble

TT — Cargo tanks (lank trucks)

TC - Tank cars
DT - Dump truck

CY - Cylinders

CM — Metal roxes, cartons, cases (including roll-offs)

CW — Wood-in boxes, cartons, cases
CF — Fiber c: plastic boxes, cartons, cases

BA - Burise cloth, paper or plastic begs

Item 14. Unit (WL/Vol.)

Enter the appropriate abbreviation from Table II (below) for the unit of measure.

Table II - Units of Measure

G - Gallons (liquids only)* L - Liters (liquids only)*

P - Pounds K - Kilograms

T - Tons (2000 lbz) M - Metric tons (1000 kg)

Y - Cubic yards' N - Cubic maters'

'IF THESE CODES ARE USED THEN YOU MUST INCLUDE THE SPECIFIC GRAVITY ROUNDED TO THE NEAREST TENTH IN ITEM J.

Item 15. Special Handling Instructions and Additional Information

Generators may use this space to indicate special transportation, treatment, storage, or disposal Information or Bill of Lading information. For International shipments, generators must enter in this space the point of departure (City and State) for those shipments destined for treatment, storage, or disposal outside the jurisdiction of the United States.

Item 16. Generator's Certification (See 40 CFR Part 262 Appendix For Waste Minimization Octalls)

The generator must read, sign (by hand), and date the certification statement, it a mode other than highway is used, the word "highway" should be crossed out and the appropriate mode (rail, water, or air) inserted in the space below. It another mode in addition to the highway mode is used, enter the appropriate additional mode (e.g., and rail) in the space below. Generators may preprint the words, "On behalf of" in the signature block or may hand write this statement in the signature block prior to signing the generator certifications.

Note — All of the above information except the handwritten signature required in item 16 may be preprinted.

TRANSPORTERS

tiem 17. Transporter 1 Acknowledgement of Receipt of Materials.

Enter the name of the person accepting the waste on behalf of the first transporter. That person must acknowledge acceptance of the weste described on the Manifest by significant and entering the date of receipt. This signature shall be that of the

Item 18. Transporter 2 Acknowledgement of Receipt of Materials.

Enter, if applicable, the name of the option accepting the waste on behalf of the second transporter. That person must acknowledge acceptance of the waste described on the Manifest by signing and entering the date of receipt. This signature shall be that of the ectual driver.

Note - International Shipments - Transporter Responsibilities......

Exports — Transporters must sign and enter the date the weeks left the United States in item 15 of Form 8700-22,______

imports — Shipments of hazardous waste regulated by RCRA and transported into the United States from enother country must upon entry be accompanied by the U.S. EPA Uniform Hazerdous Waste Manifest. Transporters who transport hazerdous waste into the United States from another country are responsible for completing the Manifest (40 CFR 263.10(c)(1)).

OWNERS AND OPERATORS OF TREATMENT, STORAGE, OR DISPOSAL FACILITIES

Hem 18. Discrepancy Indication Space

The authorized representative of the designated (or atternate) facility's owner or operator must note in this space any significant discrepancy between the waste described on the Manifest and the waste actually received at the facility.

Owners and operators of lacilities located in unauthorized States (i.e., the U.S.: EPA administers the nazardous waste management program) who cannot recover significant discrepancies within 15 days of receiving the waste must submit to their Regional Administrator and also to the Missouri Department of Natural-Resources, a letter with a copy of the Manifest et issue describing the discrepancy and attempts to reconcile it (40 CFR 264.72, 265,72, and 10 CSR 25-7.011).

Owners and operators of facilities located in Missouri, who cannot resolve the discrepancy within filteen (15) days after receiving the waste must promptly submit to the department a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

tiom 20. Facility Owner or Operator: Certification of Rocelpt of Hazardous Materials Covered by This Manifest Except as Noted In Item 19.

Print or type the name of the person accepting the waste on behalf of the owner or operator of the facility. That person must acknowledge acceptance of the waste described on the Marifest by Bioning and entering the date of receipt.



STATE SECTION INSTRUCTIONS

To Be Completed by the Generator and the Designated Facility (Items A through K)

IMPORTANT: Both the Generator's (green) and the department's original copy must be returned to you within 35 days after the date the waste was accepted by the initial transporter. Should you not receive a completed manifest back within 35 days, you MUST complete and transmit an EXCEPTION REPORT to the Department within 45 days after the date the waste was accepted by the initial transporter.

ITEM A. Missouri Manifest Generators Document Number

- 1. Enter the six (6) digit Missouri Generator I.D. number which the Missouri Department of Natural Resources has assigned to your facility (reference EPA Form 8700-12/MDNR HWG-1).
- 2. Enter the shipment number which is a four (4) digit number starting with 0001. This number increases one (1) digit for each consecutive hazardous waste shipment (entire truck-load) which leaves your company.
 - a. Special instructions for out-of-state generators: Enter the shipment number which is a four (4) digit number starting with 0001, which increases one (1) digit for each consecutive hazardous waste shipment (entire truckload) which enters Missouri.
- ITEM B. Enter the location address (street, city and state if different) where the waste is being picked up. Enter "same" if the mailing and location address are identical.
- ITEM C. Enter the first transporter's Missouri license number assigned to the transportation firm by the department then enter the state of registration and then the license plate number of the waste carrying portion of the vehicle (e.g., MO 12334).
- ITEM D. Enter the first transporter's telephone number.
- ITEM E. Enter the second transporter's Missouri license number. assigned to the transportation firm by the department (if applicable) then enter the state of registration and the license plate number of the waste carrying portion of the vehicle (e.g., MO 12344).
- ITEM F. Enter the second transporter's telephone number.
- ITEM G. Enter the 6 digit identification code of the designated facility assigned by the department (if applicable). If none has been assigned, leave blank.
- ITEM H. Enter the designated facility's telephone number.
- ITEM I. EPA Waste No.: Enter the EPA waste number from 40 CFR Part 261, Subparts C & D. If none is applicable, enter "NONE". Do NOT leave blank. Enter other applicable EPA waste codes under Item J. All regulated constituents within a mixture must be identified.

State Waste No.: Enter the Destination State Waste Code if one exists. If there is no Destination State Waste Code. enter the Generator State code here. If there is both a Destination and Generator State waste code, enter the Destination State waste code under Item I, and the Generator State code under Item J.

If no state waste code exists, enter "NONE".

- ITEM J. Enter the additional U.S. EPA waste codes followed by a percentage range by volume of each, and if applicable, the specific gravity rounded off to the nearest tenth for each waste that is shipped. Also, this space may be used for additional required information imposed by other states.
- ITEM K. Do not make an entry here. The designated facility is required to complete this item. As a generator, you should separately specify or instruct the designated facility on how you want the waste listed on this manifest handled.

MO 780-0642 14-901

INSTRUCTIONS FOR HANDLING THE MANIFEST DOCUMENT

- 1. The generator shall complete the generator portion of the manifest document prior to the actual shipment. The generator, or an authorized agent, shall place his signature on the document. The generator shall obtain a signature from the driver (Item 17). The generator shall then retain the goldenrod copy as proof of shipment.
- 2. The truck driver then carries this document (if mode of transport is by railroad, see federal instructions) along with the actual shipment to the final destination and shall obtain a handwritten signature from an authorized agent of the designated facility. The transporter shall retain the pink copy of the manifest document for his records.
- 3. The designated facility operator shall then file the canary copy for his file and forward both the original and the green copy back to the generator within 35 days after the date the waste was accepted by the initial transporter. See special instructions to the designated facility.

INSTRUCTIONS FOR THE DESIGNATED FACILITY

- 1. This manifest document contains an optional copy (blue) should. an out-of-state generator's state regulatory office require that you send it directly to that state office. If that is not required, then send the optional copy back to the generator.
- 2. Discrepancy Instructions. If not resolved between the generator and the designated facility within 15 days of the shipment's arrival, the designated facility shall promptly submit a letter which details the situation to the department.

Special Manifest Handling Instructions for Shipment by Rail. After the generator completes and signs the manifest document and retains the goldenrod copy, he may mail this document directly to the designated facility.

ITEM K. The designated facility is required to complete this item.

- If final disposition is to occur at the facility listed on this manifest. enter the appropriate handling code from the following table
- If final disposition is to occur at a facility other than the facility listed on this manifest, enter the appropriate handling code in the "interim" column then enter the final handling code from the following table which is intended for each waste identified on this manifest when reshipped.

HANDLING CODE TABLE

INTERIM - ONLY THE FOLLOWING CODES MAY BE USED

- STORAGE
 - S01 CONTAINER (BARREL. DRUM, ETC.)
 - SO2 TANK
 - S03 WASTE PILE
 - S04 SURFACE IMPOUNDMENT
 - S05 OTHER (SPECIFY IN COMMENT SECTION)

FINAL - ONLY THE FOLLOWING CODES MAY BE USED

- TREATMENT
- T02 SURFACE IMPOUNOMENT
- T03 INCINERATION
- TO4 OTHER (FUEL BLEND. REDISTILLATION, SEPARATION OF COMPONENTS. NEUTRALIZATION, ETC. SPECIFY IN COMMENT SECTION
- DISPOSAL
 - . D79 OEEPWELL INJECTION
 - . D80 LANOFILL
 - . D81 LANO APPLICATION
 - D83 SURFACE IMPOUNOMENT (TO BE CLOSED AS A LANDFILL)
 - **OB4** OTHER (SPECIFY IN COMMENT SECTION

INSTRUCTIONS FOR THE COM-PLETION OF THIS FORM ARE ON A SEPARATE SHEET. THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS. MISSOURI DEPARTMENT OF NATURAL RESOURCES Division of Environmental Quality Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102 314-751-3176

EMERGENCY RESPONSE
U.S. COAST GUARD
1-800-424-8902
CHEM TREC
1-800-424-9900
DEPT OF NATURAL RESOURCES
314-534-2436

HAZARDOUS WASTE MANIFEST

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